

REFERENCE # 6
SITE NAME Bennitt Landfill
SITE ID 140980650045

MEMORANDUM

RECEIVED

AUG 23 1977

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

DATE: August 2, 1977
TO: Division File
FROM: P. R. Steadman
SUBJECT: Will County - LPC 19708304 - Rockdale/Bennitt

CLOSED-NOT COVERED CLOSURE PROGRAM

GENERAL BACKGROUND:

The subject facility is legally described as within the NE 1/4 of the NE 1/4 of Section 24, T. 35N. (Troy Twp.), R. 9E. and the NW 1/4 of the NW 1/4 of Section 19, T. 35N. (Joliet Twp.), R. 10E. of the 3 P.M. It is bordered on the north by Interstate 80, on the south by Moen Avenue, on the east by Illinois Route 7 (Larkin Ave.) and the presently operational Rockdale/M & W no. 3 site, and on the west by the presently operational Rockdale/C & A Disposal facility. The original tract occupies 260 acres in the Des Plaines River Valley. This site just falls short of being within the flood plain area of the Des Plaines River. An unnamed intermittent stream traverses (beneath site at points flowing thru a culvert) the site from North to South and empties into a series of lagoons at a point approximately 1/4 mile to the south of the site. The stream's elevation approximates the top of the zone of saturation and as such renders depth information to the ground surface of about 10 feet. It appears that the groundwater flow from the site moves with the intermittent stream rather than downward into deeper aquifers. In an ISGS opinion of the site (12/15/71), the facility is overlaid by glacial drift composed of highly permeable sands and gravels to a maximum depth of 20 feet at whose depth Silurian aged dolomite bedrock is encountered, the aquifer of most private wells in this location, and, as such, is "unsuitable for a landfill".

The available file information indicates that this facility has been a matter of serious concern to IDPH and the Illinois Sanitary Water Board during the years 1968 and 1969, and has continued to vex this agency to a point of enforcement consideration on December 17, 1970. No action was taken, however. Since that date at least 26 formal inspections of the site have been conducted. Most recently the site has been inspected on the dates of August 1, 1977, June 2, 1976 and April 28, 1976. All inspections indicated the same basic violations relative to inadequate



final cover application and the majority of the inspection reports demonstrated the presence and/or disposal of non-permitted hazardous or environmentally toxic materials. Mr. Fred Bennitt, site owner/operator, has been quick to respond to agency letters from June, 1972 through May, 1976 and has admitted receipt of hazardous wastes (5/29/76, 6/18/72, 4/21/71, 2/23/71) and he had promised to properly close and cover the site on at least two occasions (1/18/72 and 10/15/71). The Agency has written at least 15 letters to Mr. Bennitt between the dates of 8/77 and 8/71 requesting cooperation as far as resolving the permit question (O/I), resolving the final cover problem (C/NC), and appropriate disposition of hazardous wastes. Beyond Mr. Bennitt's application for an IPCB variance (3/31/71) which apparently was denied, none of the problems have been resolved, and the site to date constitutes an extreme threat to the environment and groundwater supplies throughout the vicinity of the site. The site has been reclassified as 'Operating' as of the 8/1/77 inspection - due to unresolved questions relating to hazardous waste receipt and other solid waste receipt and disposal.

TECHNICAL BACKGROUND:

Inasmuch as this facility has an extensive history of illegal or non-permitted hazardous liquids and solids receipt, and because of the generally poor geology of this site as far as any attenuation capabilities, this facility would prove to be a good candidate for exploratory drilling and may well prove to be a site where a complete technological excavation is warranted. There are no monitor wells upon the site to serve as an index in determining whether groundwater degradation has occurred. A complete water quality survey of all private residence wells within 1 mile of the site and sampling of the intermittent stream is suggested as a prerequisite to the above stated plan of resolving the conditions upon the site.

At least five acres of this facility are in need of one foot to 1 1/2 feet of low permeability soils to compose an estimated volume of 12,100 yd³ to satisfy the requirement of Rule 305(c). (The volume is determined by 43,560 ft² per acre x 1.5' required per acre x 5 acres 27 to yield cubic yardage). Sufficient clayey materials could be derived from areas within a 10 mile radius of the site at a cost of \$3.50/yd³ delivered to yield a cost of \$42,350 for the needed earth. Two weeks work utilizing a grader (cost = \$42/hr including operator's wages), two heavy (200-410 HP, 44,800 lbs - 93,400 lbs) track-type tractors (cost = \$45/hr. including wages) would be necessary to bring this site minimally into compliance at a cost of \$53,000 (\$10,560 for equipment use). Further, all hazardous wastes (paints, solvents, slugs, paint derivatives) now upon the site should be required to be removed whatever the cost, and with collected expediency.

RECOMMENDATIONS:

This facility needs to be put on a stringent enforcement program and compliance should be achieved by no later than October 3, 1977. All potentially hazardous liquid and solid waste requires immediate removal to, eg., Joliet/E.S.L., sites with adequate hydrogeology for safe disposal and a strong admonition against any future storage or disposal of such waste types upon this facility should be sent out to Mr. Bennitt and other responsible personnel as an effort to discourage such activity in the future. Posting of an at least \$100,000 performance bond should be mandatory and should not be construed to be too high or too impractical if one considers the possibly extensive damage to groundwater quality already from this site and the resultant liability on Mr. Bermitt's part should such theory become fact.

PS:dw/487/4-6
August 18, 1977

cc: Northern Region (2)
Land FOS Manager - W. C. Child
Technical Support - M. M. Nienkerk
Enforcement Programs - J. H. Rein